

United States Bankruptcy Court

Middle District of Pennsylvania

WILMINGTON SAVINGS FUND,FSB, d/b/a

HWV

CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR

PRETIUM MORTGAGE ACQUISITION TRUST

RE: CHARLES J. DEHART, III ESQ,

(Trustee)

vs.

Kimberly Wright

(Respondent)

CHARLES J. DEHART, III ESQ,

(Trustee)

Case Number: 1-18-00373-

Chapter: 13

U.S. BANKRUPTCY COURT
CLERK

2019 OCT -8 AM 9:57

FILED
HARRISBURG, PA
CWB

Motion to Reinstate

1. Respondent has submitted all or such portion of 2017 income statement to the Trustee as requested.

2. a.) The claim =an uncollectible claim filed by another creditor, and fees requested by the debtor's attorney or other professional appointed by the court.

b.) Manchester Twp - is current and up to date and there never was a past due balance when the creditor first filed their claim.

c.) The amount of the claim is incorrect and overfunded by (Wilmington Savings Fund- Claim#1)

3. a.) Income return for 2017 has been submitted per Trustee request.

4. a.) Local Form 3015-1 was submitted as per the Trustee and the Court.

WHEREFORE, Respondent alleges the plan is confirmable and therefore Respondent prays that this Honorable Court will:

a. Reinstate Chapter 13 Bankruptcy

b. Approve confirmation of Respondent(s) plan.

Respectfully submitted;
KIMBERLY WRIGHT, prose
2536 EASTON BLVD #122
YORK, PA 17402

United States Bankruptcy Court

Middle District of Pennsylvania

WILMINGTON SAVINGS FUND,FSB, d/b/a
CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR
PRETIUM MORTGAGE ACQUISITION TRUST
RE: CHARLES J. DEHART, III ESQ,

Case Number: 1-18-00373-HWV

Chapter: 13

(Trustee)

vs.

Kimberly Wright

(Respondent)

RE: CHARLES J. DEHART, III ESQ,

(Trustee)

CERTIFICATION OF SERVICE

I, Kimberly Wright, hereby certify that the Motion to Reinstate Chapter 13 was served by first class mail, postage pre-paid, and email upon parties listed below on October , 2019.

WILMINGTON SAVINGS FUND,FSB, d/b/a
CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR
PRETIUM MORTGAGE ACQUISITION TRUST
120 SOUTH 6TH STREET
SUITE 2100
MINNEAPOLIS, MN 55402

KIMBERLY WRIGHT, prose
2536 EASTON BLVD #122
YORK, PA 17402